

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. ____

CR 22-106 WMW/BRT

UNITED STATES OF AMERICA,

Plaintiff,

INDICTMENT

v.

18 U.S.C. § 641

JACK PHILLIP RONALD KAISER,

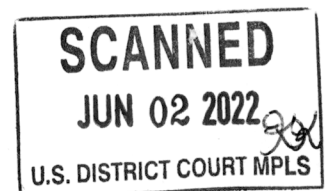
Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

BACKGROUND

1. At all relevant times to the charge in this Indictment, the Social Security Administration (“SSA”) was an independent agency of the United States administering a number of federal benefit programs, including the Retirement Insurance Benefit program under the authority of Title II of the Social Security Act of 1935, as amended, pursuant to 42 U.S.C. §§ 401-433. Retirement insurance benefits are monthly cash payments that cease to be paid upon the death of the beneficiary.

2. The mother of Defendant **JACK PHILLIP RONALD KAISER**, as identified in this Indictment as “B.K.,” received retirement insurance benefits during her lifetime. The SSA directly deposited B.K.’s benefits into her Chase Bank checking account, to which **KAISER** had access.



3. On or about February 16, 2016, Social Security retirement insurance beneficiary B.K. died, survived by her son, Defendant **JACK PHILLIP RONALD KAISER**.

4. The SSA was not timely notified of B.K.'s death and continued to deposit monthly benefits payments into B.K.'s Chase Bank checking account. Beginning in and around February 2016 and continuing through in or around February 2021, **KAISER** continuously accessed B.K.'s Chase Bank account and fraudulently obtained and converted B.K.'s retirement insurance benefits funds deposited by the SSA for the Defendant's own expenses.

5. In or about February 2021, after the SSA was notified about B.K.'s death, the SSA terminated B.K.'s retirement insurance benefits payments.

6. **KAISER** improperly received and converted to his own use approximately \$51,364.00 in retirement benefits insurance that were intended for B.K., who was deceased, which Defendant knew he was not entitled to receive.

COUNT 1
(Theft of Government Funds)

Beginning in or around February 2016 and continuing through February 2021, in the State and District of Minnesota, the Defendant,

JACK PHILLIP RONALD KAISER,

did knowingly and willfully embezzle, steal, purloin, and convert to his use money of the Social Security Administration, a department and agency of the United States, to wit:

Social Security retirement insurance benefits having a value greater than \$1000.00, all in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

As a result of the offense alleged in Count 1 of this Indictment, Defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of 18 U.S.C. § 641 (Theft of Government Funds). The United States reserves its right to seek a money judgment forfeiture, to forfeit substitute assets, and to forfeit additional directly forfeitable property as provided for in 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON